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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dawn M. Sciarrino

Our File No.
0484-101-63

December 28, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D.C. 20554

Reference: Heartland Communications, Inc.
MM Docket No. 92-233
RM-8078

Dear Ms. Searcy:

Submitted herewith on behalf of Heartland Communications, Inc., are an original and four copies of its "Comments and Counter Proposal in Response to Notice of Proposed Rule Making" in the above referenced proceeding. The original Declaration of George E. Owen, Jr., will be filed upon receipt.

If there are any questions in regard to this matter, please communicate directly with this office.

Respectfully submitted,

HEARTLAND COMMUNICATIONS,
INC.

By *Dawn M. Sciarrino*
Dawn M. Sciarrino
Its Attorney

DMS:dh
Enclosure

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Before The
Federal Communications Commission

Washington, D.C. 20554

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DEC 28 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In The Matter Of)
)
Amendment of Section 202(b) of) MM Docket No. 92-233
Table of Allotments.) RM-8078
FM Broadcast Stations.)
(Campbellsville and Mannsville,)
Kentucky).)

To: Chief, Allocations Branch

**Comments and Counter Proposal
in Response to
Notice of Proposed Rule Making**

Heartland Communications, Inc. ("Heartland"), by its attorneys and pursuant to the above-captioned Notice of Proposed Rulemaking ("NPRM"), DA 92-1324, released November 5, 1992, hereby submits its Comments and Counter Proposal to the Petition for Rulemaking filed by Patricia Rogers ("Rogers"), permittee of Station WVLC(FM), Channel 260A, Campbellsville, Kentucky. In support thereof, the following is stated:

Introductory Statement

1. Heartland owns and operates Stations WTCO(AM) and WCKQ(FM) at Campbellsville. The stations have served Campbellsville and Taylor County since 1948 and 1964, respectively. Heartland has operated the stations since 1985.¹ While we welcome the potential for a new, competitive broadcast service that WVLC represents, we believe that

¹ Heartland is also the permittee of Station WTCO-FM, Russell Springs, Kentucky.

the Rogers proposal to relocate WVLC to Mannsville, Kentucky, as a Class C3 FM station is a grossly inefficient use of the FM broadcast spectrum, and is indeed a charade. This is not so much a reflection upon Rogers's designs, purposes, and intent as it is a criticism of the Commission's FM allotment process, which forces the licensee or permittee to engage in the pure fiction that it will provide the anachronistic concept of a "transmission service" for a place claimed to be a "community" that cannot possibly support a commercial broadcast facility of *any* size, let alone a Class C3 FM station.²

2. On its face the Rogers proposal would substitute Channel 260C3 for Channel 260A at Campbellsville, and reallocate Channel 260C3 to Mannsville, Kentucky, to permit an upgrade of the authorized but unbuilt facilities of WVLC. In reality, it is painfully obvious that in her quest for upgraded facilities, Rogers was guided first by spacing requirements that preclude principal community coverage of Campbellsville from a Class C3 facility; that the choice of reference coordinates for a Channel 260C3 allotment was dictated by protection to Channel 259B, Louisville; and that, having located an acceptably spaced theoretical site,

² The history of the hapless Channel 260A allotment is a testament to the very real risk, no doubt perceived by Rogers, that Campbellsville cannot economically support another broadcast facility. Allotment of the channel was originally sought by Michael Harding, a former employee of Station WGRB(TV), Channel 34, Campbellsville. Although Harding applied for the channel, he dropped out and has since left the community. (Reflecting the rampant speculation in FM facilities throughout the 1980s, there were six applicants for the Campbellsville channel.) Rogers, a public school teacher with no broadcast experience, bought out the last remaining applicant in order to obtain her permit (*David H. Greenlee (MM Docket 91-96)*, FCC 92D-22 (Initial Decision), released March 24, 1992). Heartland's own experience in the Campbellsville market is instructive: it operated VHF Channel 4 as a low power television station for several years until economic necessity forced it to donate the facilities to Campbellsville Community College.

Rogers picked the unincorporated place known as Mannsville to be the “community” of license.

3. Campbellsville is the county seat of Taylor County (1980 pop. 21,178), and is the county’s largest community (1980 pop. 8,715). The unincorporated place named Mannsville lies on the eastern edge of the county, about seven miles from Campbellsville.³ Unquestionably, Rogers will attempt to serve Campbellsville, and to obtain advertising revenues from there.

4. Heartland believes that if Rogers is unwilling to serve Campbellsville with Class A facilities, but instead adopts the pretext of service to Mannsville in order to obtain an upgrade, then the proposal warrants thorough examination under Section 307(b) of the Communications Act for its efficiency and practicality. The Rogers proposal is neither efficient nor practical, as we show below.

5. Heartland has canvassed the potential for efficient utilization of Channel 260 in central Kentucky, and has developed an alternative that Section 307(b) would find sound and sensible. Heartland herein submits a counter proposal which would reallocate Channel 260A to Dunnville, Kentucky, in adjacent Casey County, enabling Rogers to provide a first local transmission service to that community, *and* which would enable the allotment of Channel 260A to Brownsville, Kentucky, the county seat of Edmonson County. Heartland’s counter proposal would thus provide first local transmission service to *two* communities. Heartland herein expresses its interest in applying for a construction permit for a new FM

³ Mannsville is not even listed in the “Index to United States Counties, Cities, and Towns” of the Rand McNally Road Atlas (1990).

broadcast station on Channel 260A at Brownsville. We set forth the relevant facts below.

Facts

6. Rogers proposes to upgrade her authorized facility and relocate the permit to a new community of license.⁴ Rogers claims that Mannsville is an unincorporated community with a population of 2,145 persons and is a Census Designated Place.⁵ Rogers recites that Mannsville has a U.S. Post Office, one manufacturing company, four churches, numerous civic organizations and an elementary school.⁶ Allotment of Channel 260C3 at Mannsville would provide a first local transmission service.⁷

7. Mannsville is not a Census Designated Place but is a “Census County Division” located in Taylor County, Kentucky, seven and one-half miles east of Campbellsville.⁸ Census County Divisions serve no legal function and provide no governmental services.⁹ The major communities served by Rogers’ s proposed allotment, including Campbellsville, currently have local service.¹⁰

8. Heartland’s counter proposal would allot Channel 260A to Dunnville, Kentucky and Channel 260A to Brownsville, Kentucky, and would modify Rogers’s construction permit to specify Dunnville, Kentucky as her city of license. The counter proposal is mutually

⁴ NPRM at ¶ 1.

⁵ NPRM at ¶ 2.

⁶ *Id.*

⁷ NPRM ¶ 3.

⁸ Engineering Statement of Clarence E. Henson (“Engineering Statement”) , dated December 22, 1992, at page 3.

⁹ Engineering Statement at page 2.

¹⁰ Engineering Statement at page 5.

exclusive with Rogers's proposal.¹¹ All Commission regulations and minimum distance separation requirements are met.¹² Heartland intends to apply for Channel 260A at Brownsville, Kentucky, if the proposed allotment is adopted.

9. Dunnville, located in Casey County, Kentucky, has a population of 2,358 persons and was incorporated in 1878.¹³ Dunnville has three manufacturing firms, three general stores, two churches, a U.S. Post Office, bank branch office and a deli/gas station.¹⁴ The proposed allotment would provide Dunnville with its first local transmission service.¹⁵

10. Brownsville is a fifth class city and is the county seat of Edmonson County, Kentucky.¹⁶ The population of the city of Brownsville proper is 897.¹⁷ The Brownsville Census County Division of which the city is a part has a population of 4,810 persons.¹⁸ The adjacent Census County Division of North Brownsville has a population of 3,202.¹⁹ The city of Brownsville was created by an act of the state legislature in 1928.²⁰ Brownsville is its own taxing authority and has three manufacturers including the county newspaper, *The Edmonson News*.²¹ In addition, Brownsville has two banks, including the Brownsville Deposit Bank, a public library and numerous local merchants.²² Brownsville is the home

11 Engineering Statement at page 1.
12 Engineering Statement at pages 1-2 and attachments.
13 Engineering Statement at pages 2-3.
14 Engineering Statement at page 3.
15 Engineering Statement at page 5.
16 Engineering Statement at page 4.
17 *Id.*
18 *Id.*
19 *Id.*
20 *Id.*
21 *Id.*
22 *Id.*

of the annual Edmonson County Fair each September, the County Homecoming in August and the Riverfest in October.²³

11. Edmonson County has a population of 10,357 persons.²⁴ It is home to the Mammoth Cave National Park, one of the “Seven Wonders of the World” and the Nolin River Lake recreational area.²⁵ Mammoth Cave National Park is also a United Nations World Heritage Site and hosted more than 1,800,000 visitors in 1989.²⁶

12. No community in Edmonson County has a first local transmission service licensed to it.²⁷ The proposed allotment would provide Edmonson County and specifically its county seat, Brownsville, with its first local transmission service.²⁸

Discussion

13. To determine which proposal best serves the public interest, the “Commission weighs the public interest benefits from FM allotment proposals in light of its FM allotment priorities. The FM priorities are (1) first aural service, (2) second aural service, (3) first local service, (4) other public interest matters. Co-equal weight is given to priorities (2) and (3). *See Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88, 92 (1982).”²⁹ All three communities proposed for allotments would receive a first local transmission service. Thus, the decision of which proposal is to

²³ *Id.*

²⁴ Engineering Statement at page 5.

²⁵ *Id.*

²⁶ *Id.*

²⁷ *Id.*

²⁸ *Id.*

²⁹ *FM Channel Assignments (Eatonton and Sandy Springs, Georgina and Anniston and Lineville, Alabama)*, 70 RR 2d 182, 187 (1991).

be preferred is based on Section 307(b) considerations.³⁰ Section 307(b) generally grants a dispositive preference to the applicant who specifies the community with the greater need for local broadcast service.³¹

14. Section 307(b) considerations dictate the allotment of Channels 260A to Dunnville and Brownsville, Kentucky. The Heartland counter proposal provides first local transmission service to *two* communities -- one of which is city created by the State Legislature and is the county seat of Edmonson County and the other of which is an incorporated community. The Rogers proposal seeks to bring first transmission service to an area that is neither a Census Designated Place nor incorporated and which does not qualify as a community. Heartland's proposal is therefore, favored under Section 307(b) analysis, for providing two needy communities with their first local transmission service.

15. Preference for Heartland's proposal is strengthened by the fact that it will bring first transmission service to a county of over 10,000 persons which is home to a national and international natural landmark drawing nearly two million visitors yearly and currently served by no local transmission services. The communities served by Rogers's proposed allotment of Channel 260C3 currently have their own local service. Thus, assuming *arguendo*, Mannsville is a community for 307(b) analysis, allotment to the Dunnville and Brownsville communities is preferred on the basis of need.

³⁰ See *Reeder v. FCC*, 865 F.2d 1298, 1305 (D.C. Cir. 1989).

³¹ *Reeder v. FCC*, 865 F.2d at 1305.

Conclusion

WHEREFORE, the premises considered, Heartland Communications, Inc. respectfully requests that the Commission deny the Petition for Rule Making filed by Rogers seeking to amend the Table of Allotments to allot Channel 260C3 to Mannsville, Kentucky, and that it grant the proposed amendment of the Table of Allotments to allot Channel 260A to Dunnville and Brownsville, Kentucky, as proposed by Heartland.

Respectfully submitted,

HEARTLAND COMMUNICATIONS, INC.

By: 

John Wells King
Dawn M. Sciarrino

Its Attorneys

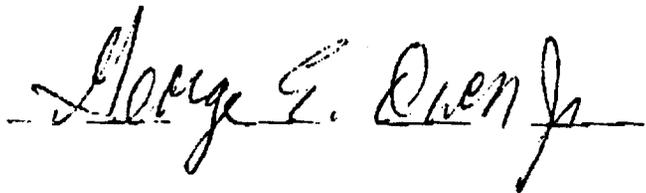
HALEY, BADER & POTTS
Suite 900
4350 North Fairfax Drive
Arlington, VA 22203-1633
703/841-0606

December 28, 1992

DECLARATION

I, George E. Owen, Jr., do hereby, under penalty of perjury of the laws of the United States, do hereby declare and state as follows:

1. I am President of Heartland Communications, Inc.
2. I have read the "Comments and Counter Proposal in Response to Notice of Proposed Rule Making" to which this Declaration is attached.
3. The facts stated therein of which I have personal knowledge and which are not supported by the engineering statement of my consulting engineer, Clarence E. Henson, are true and correct. Those facts of which I do not have personal knowledge I believe to be true upon information and belief.



Dated December 28, 1992

Electronic Laboratories, Inc.

BROADCAST & INDUSTRIAL ELECTRONIC CONSULTANTS
 SUITE 206 - 800 BUILDING, 800 S. 4th STREET
 LOUISVILLE, KENTUCKY 40203

ENGINEERING STATEMENT

This Engineering Statement has been prepared by Electronic Laboratories, Inc. for Heartland Communications, Inc., George Owen, President. This Statement is in support of Heartland's Comments regarding MM Docket No. 92-233 and Heartland's Counter-Proposed Rule Making to the Federal Communications Commission.

Electronic Laboratories, Inc. has performed an engineering analysis and has determined that the Federal Communications Commission's FM Table of Allotments could be changed as follows:

City	Channel Number	
	Present	Proposed
Campbellsville, Kentucky	281C3, 260A	281C3
Brownsville, Kentucky	-----	260A
Dunnville, Kentucky	-----	260A

These allotments to Brownsville and Dunnville could be made at various sites. In making our analysis of the proposed allotments the following coordinates were used:

Brownsville : 37-17-35 North Latitude and 86-17-00 West Longitude
 Dunnville : 37-11-00 North Latitude and 84-59-00 West Longitude

As indicated by the attached tables, all minimum distance separation requirements of the Commission would be met at the proposed coordinates, except for the fact that both proposed allotments would be mutually exclusive with another proposed rule making (MM Docket No. 92-233). This other proposed rule making was filed by Patricia Rogers and would also delete Channel 260A from Campbellsville, Kentucky but would add Channel 260C3 to Mannsville, Kentucky. Channel 281 C3 in Campbellsville is currently licensed to Heartland Communications, Inc. and operates as radio station WCKQ. Channel 260A in Campbellsville is currently a Construction Permit licensed to Patricia Rogers.

Brownsville/Dunnville

Page Two

Attached to this Statement are two tables. Table One is a spacing study for Brownsville and Table Two is the spacing study for the Dunnville allocation. Both studies utilize the FCC database as of 11/24/92.

A station built at the coordinates used in analyzing the allotment for Dunnville, would easily cover Dunnville with a 3.16 mv/m city grade contour, since Dunnville is only 3.28 km from the proposed coordinates. With regards to the Brownsville allotment, an average terrain evaluation study was performed using the NGDC 30 second elevation point database. This data was employed along with the proposed ERP and the applicable FCC F(50,50) FM curves of the Commission rules. Our determination was that a Class A station operating with 6 kw ERP from the proposed coordinates would cover all of the city of Brownsville with a 3.16mv/m city grade contour.

INFORMATION ON DUNNVILLE, MANNSVILLE AND BROWNSVILLE :

In the Commission's Notice of Proposed Rule Making released on November 5, 1992 regarding Ms. Rogers request to delete Channel 260A from Campbellsville and assign Channel 260C3 to Mannsville, it was stated that Mannsville is a Census Designated Place with 2,145 people. However, according to the 1990 United States Census of Population and Housing, publication CPH 5-19, Mannsville is not a Census Designated Place, but is a Census County Division (CCD). Dunnville is also a Census County Division. Brownsville is a fifth class incorporated city. As a point of information, Census County Divisions are established in twenty-one states, including Kentucky, and serve no legal functions and are not governmental units.

THE DUNNVILLE DIVISION :

Dunnville is a Census County Division located in Casey County, Kentucky. The population of the division is 2,358 persons. In 1989, there were 1,141 persons in the Dunnville division who worked 40 or more weeks. The household income for 1989 was \$15,543 and the per capita income was \$6,566. There were 949 housing units in the Dunnville division, of which 841 were occupied.

According to the 1991 Kentucky Directory of Manufacturers, there are three manufacturers in the community of Dunnville:

1. Tarter Gate Company, established in 1945, which manufactures metal farm gates and employs 230 workers.
2. Tarter Kolb, Inc., established in 1971, which manufactures metal farm gates and metal livestock feeders and has 100 employees.
3. Tarter Tube, established in 1975, which manufactures steel tubing and employs 15 persons.

On an historical note, Dunnville was incorporated on March 30, 1878 and was named for James Richard Dunn, who had settled there from Virginia shortly after 1840. It is located just south of the confluence of Goose Creek and the Green River. A center of attraction for years in Dunnville was the Old Water Mill and Dam, which was used primarily to produce corn meal and flour.

On December 7, 1992, I visited the community of Dunnville. In addition to what was mentioned above, I found three general stores, two churches, a Post Office (zip code is 42528), a branch bank, a deli/gas station and approximately forty houses.

THE MANNSVILLE DIVISION :

Mannsville is a Census County Division located in Taylor County, Kentucky. The population of the division is 2,147 persons. In 1989, there were 1,090 persons in the Mannsville division who worked 40 or more weeks. The household income for 1989 was \$14,838 and the per capita income was \$7,870. There were 823 housing units in the Dunnville division, of which 754 were occupied.

According to the 1991 Kentucky Directory of Manufacturers, the only manufacturer in Mannsville is the Mannsville Sash And Door Company, which was established in 1957 and manufactures window units, sashes and door frames. The company has 30 employees.

Mannsville lies at the junction of KY roads 70 and 337, seven and a half miles east of Campbellsville. It was first called Manns Lick and was named for Moses Mann, a Revolutionary War veteran. It became known as Mannsville before or at the time the post office was established in 1852.

CITY OF BROWNSVILLE :

Brownsville is a fifth class city and is the county seat of Edmonson County, Kentucky. The population of the city is 897 persons. The city of Brownsville is located in the Brownsville Census County Division. This division has a population of 4,810, including the population of the city. An adjacent division, Brownsville North, has a population of 3,202. The population of Brownsville city has grown from 542 in the 1970 Census, to 674 in 1980, to 897 in the 1990 Census.

In 1989, 347 persons in the city of Brownsville and 2,340 people in the Brownsville division worked 40 or more weeks. The household income for 1989 was \$10,699 in the city and \$15,546 in the division. The per capita income for 1989 was \$6,480 for the city and \$7,172 for the Brownsville division.. There were 1,916 housing units in the Brownsville division and 402 in the city of Brownsville. Of these 1,788 and 367 were occupied, respectively.

According to the 1991 Kentucky Directory of Manufacturers, there are three manufacturers in Brownsville:

1. Brownsville Garment Company manufactures women's clothing and employs 120 people.
2. Brownsville Ready Mix has 4 employees and produces concrete and septic tanks.
3. The Edmonson News is a newspaper with 3 employees.

Brownsville is located at the intersection of Kentucky roads 70 and 259. It is an old city, having been created by an act of the Kentucky legislature on January 30, 1828. It was probably named for Jacob Brown, who was the commanding general of the United States Army from 1821 to 1828.

Brownsville is its own taxing authority. The city has two banks, the Bank of Edmonson County and the Brownsville Deposit Bank. Brownsville has a public library with 26,567 volumes. The community holds a County Homecoming every June, the "Nolifest" each August, The Edmonson County Fair in September, and the "Riverfest" each October.

Brownsville/Dunnville
Page Five

Brownsville is the county seat of Edmonson County. This county contains most of Mammoth Cave National Park, which is a cave that extends 340 miles underground and is often called one of the "Seven Wonders of the World". It has been a national park since 1941, and in 1981 was designated by the United Nations as a World Heritage Site for significance as a natural and cultural site. In 1989 more than 1,800,000 people visited the park.

Brownsville is also within fifteen miles of Nolin River Lake, which is a major recreational area.

CONCLUSION :

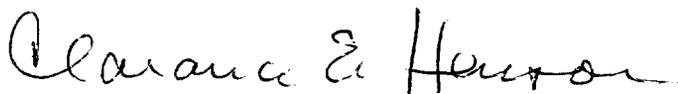
Brownsville is the county seat of Edmonson County, Kentucky. There is no radio station licensed to any community in the entire county. Edmonson County has 302 square miles and ranks 64th out of 120 counties in Kentucky in total area. The County's population is 10,357 and grew 4% from 1980 to 1990.

Heartland Communications, Inc.'s Counter-Proposal would allocate Class A FM stations to both Brownsville and Dunnville, Kentucky, rather than one Class C3 FM station to Mannsville, Kentucky. All of the significant communities served by the increase in power to C3 of the Mannsville station already have their own local service.

CERTIFICATION :

I certify that the foregoing statements and engineering exhibits have been prepared by me or under my direction and are true and accurate to the best of my knowledge and belief.

Dated this 22nd day of December, 1992.



Clarence E. Henson, P.E.
Consulting Engineer

Clarence E. Henson is a professional engineer registered in the Commonwealth of Kentucky and the State of Indiana. He is a member of the Kentucky Society of Professional Engineers, the National Society of Professional Engineers and a lifetime member of the Institute of Electronic and Electrical Engineers. He has prepared numerous applications and engineering statements for submission to the Federal Communications Commission and has appeared as an expert witness before the Commission and has been qualified to give opinion testimony.

ELECTRONIC LABORATORIES, INC.
LOUISVILLE, KY

December 14, 1992

FM Spacing study

Title: brownsville
Channel 260A (99.9 MHz)
Database: FCC 11/24/92

TABLE ONE

Latitude: 37-17-35
Longitude: 86-17-00
Safety zone: 30 km

Call	Auth	Licensee name	Chan	ERP-kw	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
WNAZ-FM LIC	Trebecca	Nazarene Colleg	*206A	1.40	36-08-33	198.3	134.4	10
Nashville	TN	15422	89.1	37	86-45-10	18.0	124.4	CLEAR
WNKJ LIC	Pennyryle	Christian Comm	*207C3	12	36-48-34	242.0	113.3	12
Hopkinsville	KY		89.3	101	87-24-20	61.3	101.3	CLEAR
WVLE LIC	Sherandan	Broadcasting C	257A	3	36-44-25	171.1	62.09	31
Scottsville	KY	BLH-910712KD	99.3	100	86-10-31	351.2	31.09	CLEAR
WKDQ LIC	Bristol	Broadcasting Com	258C	100	37-52-57	301.0	128.9	95
Henderson	KY	BLH-881025KC	99.5	300BT	87-32-27	120.2	33.90	CLEAR
ALLOD			259B		38-21-53	18.0	125.2	113
Louisville	KY		99.7		85-50-18	198.3	12.23	CLOSE
WDJX-FM LIC	Stoner	Broadcasting Syst	259B	24	38-21-53	18.0	125.2	113
Louisville	KY	BLH-870522KC	99.7	218	85-50-18	198.3	12.23	CLOSE
WWTN CP	American	Gen Media-Nashv	259C	100	35-49-03	187.5	165.1	165
Manchester	TN	BMPH-870331JT	99.7	395	86-31-24	7.4	.141	CLOSE
ALLOD			260A		37-20-36	85.9	83.81	115
Campbellsville	KY	DOC-88-215	99.9		85-20-24	266.5	-31.2	SHORT
Filing window 09/12-10/12/89 **CLOSED**								
PRM DEL	Patricia	Rogers	260A		37-25-23	80.4	90.13	115
Campbellsville	KY		99.9		85-16-45	261.1	-24.9	SHORT
WLVC CP	Patricia	Rodgers	260A	3	37-25-23	80.4	90.13	115
Campbellsville	KY	BPH-891012NC	99.9	100	85-16-45	261.1	-24.9	SHORT
DOC-91-96								
PRM ADD	Patricia	Rogers	260C3		37-11-00	96.5	102.0	142
Mannsville	KY		99.9		85-08-33	277.2	-40.0	SHORT
WRLT-FM APC	GMX	Communications of Te	261A	.20	36-20-06	205.4	117.7	72
Franklin	TN	BPH-920303ID	100.1	360	86-50-54	25.1	45.66	CLEAR
WZZF-FM LIC	Regional	Broadcasting, I	262C	100	36-56-58	253.2	129.1	95
Hopkinsville	KY	BLH-900625KA	100.3	305	87-40-18	72.3	34.14	CLEAR
WTFX CP	Louisville	Broadcasters,	263C2	31DA	38-03-49	29.4	98.42	55
Louisville	KY	BMPH-920603IE	100.5	190	85-43-52	209.7	43.42	CLEAR

DA: oddball ODD920603IE @ 0 deg

>> End of channel 260A study <<

FM Spacing study

Title: dunnville

TABLE TWO

Latitude: 37-11-00

Channel 260A (99.9 MHz)

Longitude: 84-59-00

Database: FCC 11/24/92

Safety zone: 30 km

Call City of License	Auth Licensee name St FCC File no.	Chan ERP-kW Freq EAH-m	Latitude Longitude	Br-to -from	Dist. (km)	Req. (km)
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WYLV Alcoa	CP Foothills Broadcasting, TN	*206C3 89.1	.73 303	36-00-13 83-56-35	144.4 325.0	160.6 148.6	12 CLEAR
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NEW Pioneer Cut-off 10/23/92	APC Cumberland Communities C TN	*207A 89.3	.30 234	36-28-54 84-19-33	142.9 323.3	97.48 87.48	10 CLEAR
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ALLOC Harrodsburg		257A 99.3		37-44-03 84-48-50	13.7 193.8	62.94 31.94	31 CLEAR
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ALLOC Corbin		258C2 99.5		36-57-14 83-58-41	105.7 286.3	92.96 37.96	55 CLEAR
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ALLOC Louisville		259B 99.7		38-21-53 85-50-18	330.5 150.0	151.2 38.22	113 CLEAR
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PRM Mannsville	ADD Patricia Rogers KY	260C3 99.9		37-11-00 85-08-33	270.0 90.0	14.13 -128	142 SHORT
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ALLOC Campbellsville		260A 99.9		37-20-36 85-20-24	299.5 119.3	36.28 -78.7	115 SHORT
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Filing window 09/12-10/12/89 **CLOSED**

PRM Campbellsville	DEL Patricia Rogers KY	260A 99.9		37-25-23 85-16-45	315.6 135.4	37.36 -77.6	115 SHORT
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WLVC Campbellsville DOC-91-96	CP Patricia Rodgers KY BPH-891012NC	260A 99.9	3 100	37-25-23 85-16-45	315.6 135.4	37.36 -77.6	115 SHORT
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ALLOC Vancleve		260A 99.9		37-37-22 83-29-41	69.2 250.1	140.5 25.54	115 CLEAR
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Filing window 11/25-01/07/88 **CLOSED**

WMTC-FM Vancleve	CP Kentucky Mountain Holine KY BPH-920511IH	260A 99.9	6 100	37-36-23 83-26-48	70.4 251.4	143.9 28.95	115 CLEAR
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WMTC-FM Vancleve	LIC Kentucky Mountain Holine KY BLH-910108KA	260A 99.9	3 100	37-36-23 83-26-48	70.4 251.4	143.9 28.95	115 CLEAR
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WLFX Winchester	LIC Gary L. Jensen, Receiver KY BLH-851104KH	261A 100.1	1.40 140	38-01-47 84-16-46	33.2 213.6	112.6 40.64	72 CLEAR
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ALLOC Winchester		261C2 100.1		38-08-00 84-29-35	22.1 202.4	114.0 7.970	106 CLOSE
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ELECTRONIC LABORATORIES, INC.
LOUISVILLE, KY

December 14, 1992

FM Spacing study

Title: dunnville
Channel 260A (99.9 MHz)

TABLE TWO (CONT.)

Latitude: 37-11-00
Longitude: 84-59-00

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
WLFX	CP	Gary L. Jensen, Receiver	261C2	32	38-07-25	24.2	114.6	106
Winchester		KY BPH-920803ID	100.1	150	84-26-45	204.5	8.633	CLOSE
ALLOC			262C		36-11-53	148.3	128.4	95
Dak Ridge		TN	100.3		84-13-51	328.7	33.36	CLEAR
ALLOC			263C2		38-08-31	336.6	116.2	55
Louisville		KY DOC-84-231	100.5		85-30-42	156.3	61.16	CLEAR

Filing window 12/16-01/26/88 **CLOSED**

>> End of channel 260A study <<

STOP Normal Termination of Program at End Statement

CERTIFICATE OF SERVICE

I, Dinah L. Hood, a secretary in the law firm of Haley, Bader & Potts, hereby certify that a copy of the foregoing "Comments and Counter Proposal in Response to Notice of Proposed Rule Making" was mailed, this 28th day of December, 1992 to the following:

- * Mr. Michael C. Ruger
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau
2025 M Street, N.W., Room 8318
Washington, D.C. 20554

Jerrold Miller, Esq.
Miller & Miller, P.C.
P.O. Box 33003
Washington, D.C. 20033
Attorney for Patricia A. Rogers


Dinah L. Hood
Dinah L. Hood

* HAND DELIVERED